

# Anti-Corruption Policy

We are committed to being a strong competitor in the markets we operate in and will do so without the use of bribery or other corrupt practices to obtain an advantage and act honestly with all clients and business partners.

To meet our commitment, we will:

- Implement and communicate appropriate procedures to ensure our employees know their obligations.
- Prohibit authorising, offering, giving or promising anything of value directly or indirectly (via a business partner) to a public official, or client representative, to influence their actions or decisions, or to anyone to induce them to perform their work disloyally or otherwise improperly.
- Ensure our employees excuse themselves from any decision-making process where they have an interest that influences, or may be perceived as influencing, their ability to make an objective decision and to fulfil their responsibilities to the Ertech Group.
- Ensure employees exercise the utmost care when offering or accepting gifts and hospitality in order to protect their own and our reputation against allegations of improper behaviour and to ensure that bribery laws are not breached. Gifts and hospitality are only to be offered or accepted if they are occasional and of modest value. Hospitality to a value of \$100 or more, and gifts to a value of \$20 or more will be recorded in the Gifts & Hospitality Register in accordance with Gifts and Hospitality procedures. All gifts and hospitality provided to Government Officials must be pre-approved and recorded in the Gifts & Hospitality Register.
- Undertake appropriate due diligence when selecting and engaging business partners.
- Comply with relevant applicable legislation.
- Apply disciplinary action in the event of breach of this policy.



JAMES GIUMELLI  
CHIEF EXECUTIVE OFFICER